

1133 Westchester Avenue Suite N-202 White Plains, New York 10604 Office: 914-358-1373 Fax: 914-358-1381 www.attorneyswestchester.com

VIA ECF

July 22, 2022

Hon. Joan M. Azrack United States District Judge Eastern District of New York

> Re: USA v. Blaha 20 CR 220 (JMA)

Dear Judge Azrack:

The above referenced matter is scheduled for sentencing on August 2, 2022. The purpose of this letter is to request an adjournment of the sentencing. I have been out of the office for most of the past two months, due to personal family matters. As a result, I have not filed a sentencing submission herein, and respectfully request an additional four weeks to do so.

Additionally, I am aware Mr. Blaha's financial disclosure is lacking. It is my understanding Mr. Blaha and his business partners are at odds over certain issues related to a buyout of the defendant's shares of the closely held corporation. The amount of the buyout will have a significant impact on his ability to pay restitution and/or a fine. To complicate that process, one of the shareholders passed away, in recent weeks. According to the attorneys representing Mr. Blaha in that matter, negotiations are stalled, until a representative of the estate is appointed by a surrogates court.

Further still, among Mr. Blaha's many health conditions, on June 30, 2022, he was advised to see a specialist, for worsening kidney function. The first available appointment was September 21, 2022.

For the several foregoing reasons, I respectfully request an adjournment of the sentencing to late September. I thank the Court for its courtesy and consideration.

Very truly yours,

Kevin B. Faga (KF5829)

cc: AUSA A. Karamigios, via ECF